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October 6, 2022

Electronically Filed

Honorable Eric N. Vitaliano United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

> Re: <u>United States v. Anthony Pipitone</u> 22 Cr. 355 (ENV)

Dear Judge Vitaliano:

I am the attorney of record for Anthony Pipitone in the above referenced matter. With the consent of Government, I write to request a slight modification in the conditions of Mr. Pipitone's bail. Mr. Pipitone was arrested and released on August 16, 2022. He is currently on home detention. He has had no issues with the terms of his release, and the Court previously granted a bail modification.

Mr. Pipitone's son is a student at Sacred Heart University in Fairfield, Connecticut. The University is hosting parents' weekend from October 14-16, 2022. Mr. Pipitone would like to attend in order to participate in a limited number of events the University is planning. Specifically, he is requesting to be permitted to go to the University on Saturday October 15, 2022. If this application is approved, he will leave his home that morning and return home the same evening.

While the Government consents to this application, Pretrial Services does not, citing only "policy." However, given the limited nature of this application, and as it related directly to Mr. Pipitone's son's educational pursuits, I ask that the application be granted. I thank Your Honor for his consideration.

Respectfully submitted, *Elizabeth E. Macedonio*

Elizabeth E. Macedonio Attorney for the Defendant Anthony Pipitone

All Parties - Via ECF